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*Attorneys for Defendant
Unilever United States, Inc.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

LISA VIZCARRA, individually, and on
behalf of those similarly situated,

Plaintiff,

v.

UNILEVER UNITED STATES, INC.,

Defendant.

Case No. 4:20-CV-02777-YGR

**PARTIES' JOINT STATEMENT
ON PROGRESS OF SETTLEMENT
NEGOTIATIONS AND REQUEST
FOR EXTENSION OF STAY**

Hon. Yvonne Gonzalez Rogers

1 Pursuant to the Order entered May 14, 2024, counsel for Plaintiff Lisa
2 Vizcarra and the class, and counsel for Defendant Unilever United States, Inc.
3 (“Unilever”) (collectively the “Parties”), herein report to the Court on the status of
4 settlement and request an extension of the current stay of this case until December
5 13, 2024.

6 WHEREAS, the Parties previously reported in their last status report that the
7 Parties have agreement on the material terms of a class settlement and anticipated
8 that the settlement will be on behalf of a nationwide class and, accordingly,
9 resolved through a companion case that is pending in New York since Defendant’s
10 operating company that owns the Breyers ice cream brand is a New York
11 corporation.

12 WHEREAS, on July 3, 2024, the Parties filed the signed class action
13 settlement agreement and motion for preliminary approval with the court in New
14 York. The Parties are waiting for an order from the New York court granting
15 preliminary approval and anticipate the order will issue soon.

16 WHEREAS, the Parties have proposed to the New York court a final
17 approval hearing date of November 25, 2024.

18 NOW, THEREFORE, in view of the above, the Parties stipulate and
19 respectfully request that the Court extend the current stay of this case and continue
20 the compliance deadline currently scheduled for July 12, 2024 until December 13,
21 2024 to allow for the hearing on final approval to occur before the New York
22 court.
23
24
25

1 Dated: July 11, 2024

Respectfully submitted,

2 /s/ Michael R. Reese

/s/ August T. Horvath

3 Michael R. Reese (SBN 206773)

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Counsel for Defendant

13 *Counsel for Plaintiff*

14 *and the Class*

ATTORNEY ATTESTATION

I, Michael R. Reese, hereby attest, pursuant to N.D. Cal. Local Rule 5-1(i)(3), that the concurrence to the filing of this document has been obtained from opposing counsel August T. Horvath.

Dated: July 11, 2024

REESE LLP

/s/ Michael R. Reese

Michael R. Reese

PROPOSED ORDER

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED THAT:

The case is stayed.

No later than December 13, 2024, the parties shall file a joint statement updating the Court on the outcome of final approval hearing on the nationwide settlement.

IT IS SO ORDERED.

Dated: _____, 2024

HONORABLE YVONNE GONZALES ROGERS
United States District Judge